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October 6, 2022

BY ECF

Honorable Jennifer E. Willis
United States Magistrate Judge
United States District Court
Southern District of New York
500 Pearl St.
New York, NY 10007

Re: *International Refugee Assistance Project and Refugee and Immigrant Center for Education and Legal Services v. United States Customs and Border Protection, and United States Department of State*, 20 Civ. 3202 (GBD) (JW)

Dear Judge Willis:

In accordance with the Court's August 9, 2020 Order, ECF No. 32, we write jointly on behalf of Plaintiffs International Refugee Assistance Project ("IRAP") and Refugee and Immigrant Center for Education and Legal Services and Defendants the United States Customs and Border Protection ("CBP") and the United States Department of State ("State Department") (collectively the "Parties") to update the Court on the status of the above-captioned matter.

Since the Parties reported to the Court on August 4, 2022, ECF No. 62, Defendants have made the following record releases and provide the following updates:

In an August 18, 2022, letter, the State Department advised that it had identified three additional responsive records—it released one in full, released one in part, and withheld one record in its entirety. In a September 19, 2022, letter, the State Department advised that it had identified one additional record, which is pending intra-agency clearance. As the Parties advised in their August 30, 2021, letter, ECF No. 43, the documents being reviewed for the matter, *IRAP v. U.S. Department of State*, 20 Civ. 4728 (JPO), potentially overlap with the subject matter of the FOIA request at issue in this case, thus to the extent that any documents reviewed in connection with that case are also responsive in this matter, they will be produced. The State Department therefore plans to continue issuing responses in this case until its processing of *IRAP v. U.S. Department of State*, 20 Civ. 4728 (JPO), is complete.

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On September 30, 2022, CBP made its eleventh and final release of documents in response to the FOIA request – producing 64 pages, in whole or in part, which had previously been sent for consultation to other government agencies.

The Parties will submit their next joint status report to the Court on or before November 25, 2022 in accordance with the Court's Order.

Respectfully submitted,

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